

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHEILA PORTER, Plaintiff)	
)	
)	
v.)	
)	Civil Action No. 04-11935-DPW
ANDREA CABRAL, SUFFOLK)	
COUNTY SHERIFF'S DEPARTMENT,)	
SUFFOLK COUNTY, and)	
CORRECTIONAL MEDICAL)	
SERVICES, INC.)	
Defendants)	
)	

**ASSENTED TO MOTION OF THE DEFENDANTS ANDREA CABRAL,
SUFFOLK COUNTY SHERIFF'S DEPARTMENT AND SUFFOLK COUNTY
FOR EXTENSION OF TIME TO RESPOND TO GLOBE NEWSPAPER
COMPANY, INC.'S MOTION TO MODIFY PROTECTIVE ORDER**

Now come the Defendants Andrea Cabral, Suffolk County Sheriff's Department and Suffolk County and respectfully request an extension of time until September 15, 2005 to respond to the Globe Newspaper Company, Inc.'s (the "Globe") Motion to Modify Protective Order. Good Cause exists for this Motion.

The Defendants' response to the Globe's Motion is due September 6, 2005. Counsel for the Defendants will be out of the office for a prior personal commitment from August 29, 2005 until September 6, 2005. Counsel for the Globe has assented to the Defendants' request for additional time to file its response to their Motion.

This Motion is made in good faith and is not made to delay the action, or for any other improper purpose. Therefore, the Defendants respectfully request that the Court grant this Motion and approve the proposed extension of time for the Defendants to file its response until September 15, 2005.

Respectfully submitted
Andrea Cabral, Suffolk County Sheriff's
Department and Suffolk County
By their attorney

/s/ Ellen M. Caulo
Ellen M. Caulo
BBO# 545250
Deputy General Counsel
Suffolk County Sheriff's Department
200 Nashua Street
Boston, MA 02114
(617) 961-6681

Date: August 25, 2005

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

Counsel for the Defendants hereby certifies pursuant to the requirements of Local Rule 7.1(A)(2), she has conferred with counsel for the Globe Newspaper Company, Inc. (the "Globe") and that counsel for the Globe has assented to this motion.

/s/ Ellen M. Caulo
Ellen M. Caulo
Deputy General Counsel